

## **EXHIBIT 8**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

COMMONWEALTH OF  
MASSACHUSETTS, ATTORNEY  
GENERAL DANA NESSEL ON BEHALF  
OF THE PEOPLE OF THE STATE OF  
MICHIGAN, STATE OF ILLINOIS,  
STATE OF ARIZONA, STATE OF  
CALIFORNIA, STATE OF  
CONNECTICUT, STATE OF COLORADO,  
STATE OF DELAWARE, STATE OF  
HAWAI'I, STATE OF MAINE, STATE OF  
MARYLAND, STATE OF MINNESOTA,  
STATE OF NEW JERSEY, STATE OF  
NEW YORK, STATE OF NEVADA,  
STATE OF NEW MEXICO, STATE OF  
NORTH CAROLINA, STATE OF  
OREGON, STATE OF RHODE ISLAND,  
STATE OF VERMONT, STATE OF  
WASHINGTON, and STATE OF  
WISCONSIN,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH;  
MATTHEW MEMOLI, M.D., M.S., in his  
official capacity as Acting Director of the  
National Institutes of Health; U.S.  
DEPARTMENT OF HEALTH AND  
HUMAN SERVICES; and DOROTHY  
FINK, in her official capacity as Acting  
Secretary of the U.S. Department of Health  
and Human Services,

Defendants.

Case No. \_\_\_\_\_

**DECLARATION OF RAFAEL JAIME**

Pursuant to 28 U.S.C. § 1746(2), I, Rafael Jaime, hereby declare as follows:

1. I am over the age of eighteen and competent to testify herein.
2. I am President of United Automobile, Aerospace and Agricultural Implement Workers of America, Local 4811 (UAW 4811). UAW 4811 represents 48,000 academic workers at the University of California, including at all 10 UC campuses, 5 medical centers, and Lawrence Berkeley National Lab. UAW 4811 represents 16,000 Graduate Student Researchers, 7,000 Postdoctoral Scholars, and 5,000 Academic Researchers (including Specialists and Independent Researchers). Thousands of these researchers are funded by NIH grants on a range of biomedical research projects including new cures for cancer, and new treatments for diabetes, heart disease, Alzheimer's disease, and many more.
4. UAW 4811 members are very concerned about the impact of NIH's announcement on February 7, 2025 regarding the immediate lowering of the maximum rate for indirect costs on all current and future NIH grants to a maximum of 15%. Indirect costs (also known as "overhead") fund facilities and administration that support the work of our members in many ways including funding key research support personnel, shared equipment, maintenance of facilities, utilities and other essential overhead costs for completing our research projects. For fiscal year 2024-25, the University of California campuses negotiated indirect cost rates of 56-64% and in FY 2023-24 received a total of \$2.6 billion in NIH funding. A reduction of the indirect cost rate to 15% would result in the loss of hundreds of millions in NIH funding. Without this funding for facilities and administrative costs the capacity of our members to continue to do cutting edge research will be jeopardized. The training and education of the next generation of life scientists and medical researchers will be at risk. Further, clinical trials in pursuit of potentially life saving innovations, which are currently being conducted by our members may be disrupted.

5. Additionally, our members are embedded within their communities; they are tenants and home owners, parents, and neighbors. Threats to the funding that supports their research imperils their livelihood, and deprives California of economic growth. The NIH estimates that for every dollar it distributes in funding, \$2.46 is generated in economic activity.

6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this day of February 9, 2025

A handwritten signature in black ink, appearing to read 'Rafael Jaime', is written over a horizontal line.

Rafael Jaime